

**LOWENSTEIN SANDLER PC**

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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

LOUISIANA MUNICIPAL POLICE  
EMPLOYEES' RETIREMENT SYSTEM, on  
behalf of itself and all other similarly situated  
shareholders of VULCAN MATERIALS  
COMPANY,

Plaintiff,

vs.

PHILIP J. CARROLL, JR., PHILLIP W.  
FARMER, H. ALLEN FRANKLIN, DONALD  
M. JAMES, ANN MCLAUGHLIN  
KOROLOGOS, DOUGLAS J. MCGREGOR,  
RICHARD T. O'BRIEN, JAMES T.  
PROKOPANKO, DONALD B. RICE,  
VINCENT J. TROSINO, and VULCAN  
MATERIALS COMPANY,

Defendants.

Civil Action No. 11-cv-7571 (WJM)(MF)

**DEFENDANTS' APPLICATION FOR  
EXTENSION OF TIME TO ANSWER,  
MOVE OR OTHERWISE RESPOND  
PURSUANT TO LOCAL CIVIL RULE 6.1**

**(Document Filed Electronically)**

Application is hereby made for a Clerk's Order, pursuant to Local Civil Rule 6.1, extending the time within which Defendants must answer, move, or otherwise respond to the Complaint and Demand for Trial by Jury filed by Plaintiff Louisiana Municipal Police Employee Retirement System ("Plaintiff"), for a period of fourteen (14) days, through and including February 10, 2012; and it is represented that:

1. Defendants were served with Plaintiff's Complaint and Demand for Trial by Jury on January 6, 2012.

2. Defendants' time to answer, move or otherwise respond to Plaintiff's Complaint and Demand for Trial by Jury currently expires on January 27, 2012.

3. Pursuant to Local Civil Rule 6.1, Defendants hereby request a fourteen-day extension of time, through February 10, 2012, to answer, move, or otherwise respond to Plaintiff's Complaint and Demand for Trial by Jury.

4. This is Defendants' first request for an extension of time in which to respond to Plaintiff's Complaint and Demand for Trial by Jury.

Respectfully submitted,

Dated: January 20, 2012

By: /s/ Douglas S. Eakeley  
Douglas S. Eakeley  
**LOWENSTEIN SANDER PC**  
65 Livingston Avenue  
Roseland, New Jersey 07068  
973.597.2500  
973.597.2400 (facsimile)  
*Attorneys for Defendants*

**ORDER**

The above application is **ORDERED GRANTED** and the time for Defendants to answer, move or otherwise respond to the Complaint and Demand for Trial by Jury is hereby extended to February 10, 2012.

Dated: \_\_\_\_\_, 2012

**WILLIAM T. WALSH, Clerk**

By: \_\_\_\_\_

Deputy Clerk

**CERTIFICATION OF SERVICE**

I, **DOUGLAS S. EAKELEY**, being of full age, hereby certify pursuant to 28 U.S.C. § 1746 that I am a member of the Bar of this Court and a partner of the law firm of Lowenstein Sandler PC, attorneys for Defendants in the above-captioned matter, and that a true and correct copy of Defendants' Application for Extension of Time to Answer, Move or Otherwise Respond Pursuant to Local Civil Rule 6.1 and this Certification of Service were, on this date, January 20, 2012, filed with the Court and served via ECF on all counsel of record in the above-captioned action.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: January 20, 2012

By: /s/ Douglas S. Eakeley  
Douglas S. Eakeley  
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